Message

From: Mannix, John [mannixj@monroe.wednet.edu]
Sent: 3/3/2017 9:11:33 PM
To: Moore, Kendall [moore.kendall@epa.gov]
CC: Piplic, Devlin [piplicd@monroe.wednet.edu]; Mullin, Michelle [Mullin.Michelle@epa.gov]; Amanda Zych [azych@snohd.org]; Kevin Plemel [kplemel@snohd.org]; Jeff Ketchel [jketchel@snohd.org]; Ramanauskas, Peter [ramanauskas.peter@epa.gov]; Peachey, Robert [peachey.robert@epa.gov]
Subject: Re: PCB quartly testing for Sky Valley Education Center

I hope that I have accurately conveyed the questions you were interested in receiving answers to from PBS Environmental. If some further clarification is necessary please let me know and I will do my best to convey that to PBS.

Please see answers from Gregg Middaugh of PBS Environmental (in red) below.

John Mannix
Assistant Superintendent, Operations

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200 E. Fremont St. Monroe, WA 98272

---------- Forwarded message ----------
From: **Gregg Middaugh** <Gregg.Middaugh@pbsusa.com>
Date: Thu, Mar 2, 2017 at 1:33 PM
Subject: RE: EPA Questions Regarding SVEC
To: "Mannix, John" <mannixj@monroe.wednet.edu>
Cc: Brian Stanford <Brian.Stanford@pbsusa.com>

John,

Sorry for the delay. Its been a busy week.

Please see my responses below.

Please let us know if you have any questions.

Thanks

Gregg

From: Mannix, John [mailto:mannixj@monroe.wednet.edu]
Sent: Tuesday, February 28, 2017 11:15 AM
To: Gregg Middaugh
Subject: EPA Questions Regarding SVEC

Gregg,

Here are the questions received from U.S. EPA related to the seven air samples you have categorized as anomalies (Sample Numbers Q1-044 through Q1-056), taken during the first quarter of this year, as contained in your PCB Monitoring Report dated February 1, 2017.

Questions:

1) Can PBS provide sample data from the site sampled immediately prior to SVEC? If those results show high levels of PCBs we feel that would offer additional validation to the explanation of cross-contamination.

The data has been provided, as the same equipment and personnel performed sampling for PCB at SVEC the two days prior. See sample numbers Q1-001 thru Q1-043 in PBS report, First Quarter PCB Monitoring, dated 2/1/17.

2) Can PBS provide the QAPP for the latest series of air samples taken (Q1 2017)?

PBS did not prepare a QAPP for this project because it is our understanding these plans are only required for organizations that conduct environmental data collection on behalf of EPA through contracts, financial assistance and interagency agreements and as such a QAPP is not required for this site. This air sampling activity had occurred at this site on at least two previous occasions. For protocol followed for this site includes a senior PM/IH overseeing the following:

1. Site/project evaluation (previous work/testing at this site)
2. Laboratory vetting (ALS)
3. Analytical methodology evaluation (EPA TO-10a)
4. Media acquisition (Provided by ALS)
5. Project specific industrial hygiene technician training by PM.
6. Equipment cleaning (pumps, cords, stands) and preparation (equipment and documentation)
7. Review sample set up and operation with IH technician
8. Review chain of custody documentation/shipping with IH technician
9. Review laboratory analytical results with IH technician and peers
10. Report preparation and review by peers

3) Please ask PBS about their sampling setup and equipment used for the latest series of air samples (Q1 2017). I.E., Were they using individual pumps/equipment at each of the 50 sampling locations, or did they have a few units that were used to collect a series of samples.

The sampling train consist of high volume continuous flow sampling pump, 20 mm glass tubes, and polyurethane foam (PUF) plugs with no pre-filters. The sampler is placed on a telescoping stand at a height of approximately 4-5 feet in the area where PCB material abatement occurred. The sample train is calibrated with a rotameter at 5 liters per minute before each use. When the sample run time is completed the calibration is rechecked and recorded. The rotameter is calibrated annually with a primary standard at our IH Laboratory in Seattle.

Individual pumps were used at each sample site. Extension cords were used where needed. Duct tape was used to secure pumps to floor because they tend to move due to pump vibration. Multiple samples were not collected from a single pump. The sampling effort at this site took 3 full days due to the number of samples required for collection. The elevated PCB detection was only discovered on the samples that were collected on the last day of this testing activity.

4) If the latter scenario (question 3 above), what was the prior history of the specific piece of equipment used for the samples in question which could have contributed to the contamination.

As previously stated, "Multiple samples were not collected from the same pump."

5) Please ask PBS about the technician who took the samples in question. I.E., had they immediately come from, or recently been working at a site where high levels of PCBs were present? Could they have potentially contaminated their clothing, or equipment (flashlight, camera, pen, etc.), or their company or personal vehicle?

The two previous days the field technician was only at SVEC and had not been working on any other site. All equipment used including the vehicles were the same as the two previous days of sampling activities.

Thank you in advance for your thoughtful answers Gregg.

John Mannix
Assistant Superintendent, Operations

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